Work Force Innovation and Opportunity Act (WIOA) Unified State Plan

The Designated State Units (DSU)'s in South Dakota submit this attachment to the "Needs Assessment" section of the VR Portion of the WIOA South Dakota State Unified Plan. The public vocational rehabilitation agencies in South Dakota are submitting attachment 4.11(a) with the Vocational Rehabilitation (VR) Portion state plan update to reflect that a comprehensive statewide needs assessment has been accomplished with this plan submission. As a core partner in the Work Force Innovation and Opportunity Act (WIOA) Unified State Plan, the South Dakota Division of Rehabilitation Services (DRS or Division) has conducted an assessment of the needs of all individuals with disabilities as per the needs assessment section of the State Unified Plan and the requirements of the revised state plan guidance. Public vocational rehabilitation has collaborated with their WIOA program partners in this assessment and subsequent planning process to assure that the workforce needs of the state to include individuals with disabilities was addressed.

2016 Triennial Comprehensive Statewide Needs Assessment

The Federal Fiscal Year (FFY) 2015 marked the first year of activity in carrying out a three year set of goals and strategy based on the Comprehensive Statewide Needs Assessment (CSNA) conducted largely in the year 2014 and 2015. This South Dakota 2016 Comprehensive Needs Assessment is unique in that is shaped both by the original and standing instructions of the Workforce Investment Act of 1998 and the new 2015 Work Force Innovation and Opportunity Act. The changes have required VR programs in the nation to adapt existing plans and priorities to the structure, values, and goals of the new legislation. The foundational changes coming from the implementation of WIOA re-defined how VR programs in South Dakota approached the CSNA for the 2016 VR portion of the of new Unified Plan. As a consequence of the Reauthorization the South Dakota VR Programs in consultation and collaboration with their respective Boards (SRCs) and a South Dakota VR/Workforce Board planning group have chosen these goals for the structure of the 2016 CSNA for the Unified Plan.

- 1. Review of key data and service narrative points generated from latest available federal program year to establish if there exists any need for revisions of the 2015 CSNA findings.
- 2. Supplement the CSNA to establish a new baseline of need and strategy regarding Transition services and other needs relative to the new and additional requirements of WIOA.
- 3. Work directly with the South Dakota Workforce Council to identify the service and program needs generated by the enhanced mission, goals, and strategies of WIOA.
- 4. Revise in collaboration with the South Dakota Boards (SRCs) the VR Portion of the Unified State Plan to reflect both the new WIOA emphasis, the service needs of South Dakota individuals with disabilities, and finally adjust the goals and strategies as necessary.

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Results of Comprehensive Stateside Assessment of the Rehabilitation Needs of Individuals with Disabilities and Need to Establish, Develop, or Improve Community Rehabilitation Programs

Source Reports and Data (Base 2015 CSNA Documentation)

- 1. DRS: Agency Year End Data FFY 2013 (Board Report)
- 2. SBVI: Data Summary: RSA-2, RSA-113, and the RSA-911 Scott Sabella, Ph.D., CRC South Dakota Services to Blind and Visually Impaired Performance and Fiscal Comparison Report
- 3. DRS: Data Summary: RSA-2, RSA-113, and the RSA-911 Scott Sabella, Ph.D., CRC South Dakota Division of Rehabilitation Services Performance and Fiscal Comparison Report
- 4. DDN Public Meeting- SF, 04/25/2013
- 5. Governor's Task Force On Employing People with Disabilities
- 6. Lower Brule Disability Services Summit
- 7. Renewing the CHOICES Medicaid Waiver: Public/Tribal Forum & Questionnaire Results
- 8. SBVI 2013 Staff CSNA Survey of Needs
- 9. DRS: 2013 Staff CSNA Survey of Needs
- 10. SBVI Public Meeting 4/5/12
- 11. SBVI Public Meeting Notes Rapid City 4/13/12
- 12. South Dakota Advocacy Services Public Listening Session Summary
- 13. South Dakota Department of Human Services Strategic Plan
- 14. South Dakota DRS Board Meeting Minutes
- 15. South Dakota Services to the Blind and Visually Impaired Board
- 16. South Dakota Employment Works Task Force
- 17. South Dakota VR Service Providers- Training Survey Needs Survey
- 18. State of South Dakota Department of Transportation Public and Specialized Transportation Fiscal Year 2012
- 19. Survey of Parents/Caregivers of Children with Hearing Loss Final Report (submitted April 30, 2013)
- 20. Vocational Rehabilitation Program Federal FY 2014 Monitoring and Technical Assistance Guide
- 21. SBVI/DRS Consumer Satisfaction with Vocational Rehabilitation Services
- 22. South Dakota Indicator 14 2014 Report/South Dakota Department of Education

Source Reports and Data (Key Data and service narrative bridge analysis conducted in 2015/16)

- **1.** DRS: Agency Year End Data 2013 (Board Report), MIS Data Summary: RSA-2, RSA-113, and the RSA-911
- 2. DRS Board Minutes spanning from June 2014, through June 2015
- 3. Governors Employment Works Annual Report
- 4. Consumer Satisfaction Surveys
- **5.** Pre-Employment Transitions Services Survey
- 6. South Dakota Department of Human Services Mission and Strategic Plan
- 7. South Dakota Office of Special Education Indicator 14 Results
- 8. Analysis of notes and proceedings of DRS/SBVI, Departmental and Governors service need based public meetings.

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1) Findings for the Statewide assessment of the rehabilitation needs of individuals with disabilities residing within the state, particularly the VR services of those with:

a) The most Significant Disabilities, including their need for Supported Employment Services.

"Individual with a Most Significant Disability" means an individual with a disability who meets the criteria for having a significant disability and *in addition* has serious limits in two or more functional capacities (such as, but not limited to, mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome. Individuals who meet the criteria for this Priority Level I category are determined to be individuals with the "Most Significant Disability". The needs identified for this category are as follows:

1. Employer Public Outreach Education

This category is composed of specifically identified needs to educate employers, work environments, and the public regarding the abilities and capacities of persons with the most significant disabilities. This category pointed to a need to change the larger social context in which vocational rehabilitation services were to be received by persons who have the most significant disabilities. This category gathers prominence in the review of key data and narrative points for this 2016 CSNA in large part due to the impact of the WIOA systems change elements that emphasize the productive relationship of the disability service systems and the business communities.

2. Transition Services

Post-secondary transition services in the overall scheme of priority and investment has increased in need prominence, but through legislation and the discussions generated in hearings and needs assessment meetings. Transition services were frequently referenced in public forums and agency sponsored listening sessions. The emphasis has been on the information and referral services required by families and students regarding preparation for the post-secondary life experiences. Transition services are also receiving strong emphasis in the strategic plans of the South Dakota Department of Human Services, and the South Dakota Governor's office.

3. Benefits Work Incentives

This need often was expressed through participants in the needs assessment process who expressed misconceptions or misinformation regarding work incentives for persons with the most significant disabilities. The very content of their participation described a need for education and dissemination of corrective information.

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4. Transportation

Urban and rural transportation issues such as availability, scheduling, and cost contributed to this category of need which describes an ongoing need for persons with the most significant disabilities in South Dakota. The issues appear significantly acute in rural areas as well as those areas otherwise vulnerable to underservice in the realm of transportation options.

5. Self-Advocacy Skills

This need category references of expressions of need to assist persons with the most significant disabilities to represent their personal and service needs effectively and appropriately in social and work settings.

Response Statement: The Division in conjunction with the Board of Vocational Rehabilitation has developed new strategies in the State Plan to provide outreach/media activities for targeting employers and the general public, provide benefits specialists services for clients, improving transportation services, increase transition services for students with disabilities and increase the self-advocacy skills of individuals with significant disabilities.

b) & c) The Needs of Individuals with Disabilities who are Minorities and/or have been Unserved or Underserved

DRS reviewed data, inquired through the DRS Board and surveyed staff regarding possible underservice for individuals with disabilities with an particular attention on assessing any unmet needs of individuals who are members of minority communities. In addition, as part of the CSNA, DRS submitted its 911 data to for an impartial analysis intended, in part, to determine if the patterns of service suggested underserved or underservice for any individuals, including minorities. The following needs indicate areas of concerns that arose from these assessment inquiries.

1. Services for Native Americans

This category compiles the expressions of service need specifically addressing the needs of Native Americans. In this category are survey responses and public forum commentary expressing a need for collaboration, local education events, information and referral, economic development, more appropriate provider services, and cultural awareness. Data also indicated Native American communities also deal with significantly more challenging conditions for transitions and transition services.

2. Employer Public Outreach/Education

These comments continue to be an interactive blend of cultural/economic and finally service response issues that work together to make services to minorities, Native Americans, and refugees more difficult. Additionally potentially new WIOA configurations of service make this a continuing high priority category of need and response.

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3. Transition Services

Disengagement rates for high school exiters remain disproportionately high for high school dropouts, exiters labeled ED, American Indians, and Hispanic persons. The combined impact of both the WIOA systems change and this persistent service challenge moves transitions up in overall weight for the 2017 service plan with respect to minorities, hard to serve and unserved.

4. Rural Transportation

Even though transportation is a challenge in both rural and urban South Dakota, the perception of need is stronger in the rural low population communities where the possibilities of any public transportation options are much reduced. Again in minority communities where poverty and unemployment are present, this issue becomes proportionately more acute.

5. Rural Communities

Some rural communities in South Dakota have built in limitations and opportunities for employment due to low population, higher unemployment rates and higher concentrations of persons reporting disabilities. These factors combine make some rural areas high risk for underservice. When minorities are concentrated in these high risk rural areas, the level of risk is increased.

Response Statement: The Division in conjunction with the Board of Vocational Rehabilitation has developed strategies in the State Plan to meet the needs of individuals with disabilities who are minorities and have been unserved or underserved. The strategies include working with the Tribal Vocational Rehabilitation programs; conducting listening sessions on Native American Reservations and working with minority service organizations to increase awareness of services that are available.

d) The Needs Of Individuals With Disabilities Who Are Served Through Other Components Of The Statewide Workforce Investment System.

South Dakota enters the WIOA era with an existing comprehensive and coordinated public and private statewide workforce investment system. Throughout the WIA era South Dakota VR programs have had a partnership of agencies and employer resources described in the Unified Plan with the South Dakota Workforce Development Council. Public vocational rehabilitation has been represented on the State Workforce Council. In addition to the methods of identifying needs described elsewhere in this attachment, DRS personnel partner with the state workforce system on local workforce boards, and by attending and presenting at statewide workforce conferences.

Public vocational rehabilitation currently participates on the SD Workforce Development Council's WIOA Implementation and Planning Group to assure the shifts in emphasis in the statewide vision and goals meets the needs persons with disabilities and in alignment with the resources and opportunities of the greater South Dakota economic community.

1. Employer Public Outreach/Education

The major needs inputs in this area again referenced with high frequency the importance of employer education, coworker support systems for persons with disabilities and partnership based on good information regarding the needs and capacities of individuals with disabilities. The

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Assessments; Estimates; Goals and Priorities: Strategies; and Progress Reports -Results of Comprehensive Stateside Assessment of the Rehabilitation Needs of Individuals with Disabilities and Need to

Establish, Develop, or Improve Community Rehabilitation Programs

Workforce system was a natural reference point for the diverse parties to focus their efforts to meet this need.

2. Work Force Process

The state of South Dakota at the level of Governor and Department are focused in their strategic plans on creating a system in which people with disabilities can better express their abilities in the work force. The attention of the state's larger administrative systems is committed to enhancing the work force process more effectively respond to people with disabilities. DRS, in turn, will experience the need to develop coordinated responses in its own service delivery relationships with the developments within these partner workforce organizations.

3. Skilled Employment Training

There were requests for the work force system to generate and offer more specialized skill training opportunities for people with disabilities.

4. Services For Native Americans

Frequently the scope of needs for people with disabilities residing in the Native American nations exceeds the scope of the VR program. For some of these needs the response will likely need to be scoped more appropriately to the work force system as a whole. Needs such as economic development, more job opportunities, transportation, supports of daily living were most frequently expressed in a larger service system context of which DRS VR would be one of many partners.

5. Local Economic Development

Again, in the "at risk" rural communities, the foundational economy of jobs is the central issue. For work to be available for persons with disabilities in the home communities where they choose to live, the current economic reality and structure needs to be changed and enhanced. The VR response scope is limited in this in terms of larger scale economic development, and the perception of need implies a broader systemic state workforce response.

Response Statement: The Division in conjunction with the Board of Vocational Rehabilitation has developed strategies in the State Plan to meet the needs of individuals with disabilities who are being served through the Statewide Workforce Investment System. The Division is co-located in 8 of the 11 offices with the Department of Labor and Regulation. The strategies include working with others to develop activities and materials that address employer and workforce outreach and education. Specific activities related to employer and public outreach and education are also included in the Governor's Employment Works Task Force initiatives.

e) Individuals who are youth with disabilities and students with disabilities including as appropriate their need for pre-employment transition services or other transition services

The South Dakota Agency conducted a statewide survey to establish a baseline of availability of the core pre-employment transition services from which strategies will be developed in response to areas in the state and in school districts where access to some or all services is less than sufficient given the vision of the state. Survey results indicated that between 67% and 74% of the South Dakota school surveyed were estimated to be able to provide all 5 core services to ½ or

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more of their students with disabilities. Between 26% and 33% could provide these core services to less than half their students with disabilities. Given the goal of meeting the Pre-Employment Transition (PET) needs of all students of transition age, the results of this survey will be integrated into the larger Unified plan to establish a strategy for continuously improving access to the 5 core PET services across the state of South Dakota

Response Statement: The Division in conjunction with the Board of Vocational Rehabilitation has developed strategies in the State Plan to meet the needs of students with disabilities in obtaining Pre-Employment Transition Services. The strategies include working closer with local education agencies increasing the availability of PETs, coordination of plans and increasing transition services for students with disabilities.

2) Assessment of the need to establish, develop or improve Community Rehabilitation Programs.

The CSNA surveys and forums gave evidence that the public and DRS staff are looking for additional, enhanced resources to serve their clients through the provider world (Community Rehabilitation Programs). The data indicates that there is a staff perception that some change is needed in the provider service configuration to continue to effectively serve wide and diverse range of needs of clients on the DRS caseload. The need changes expressed tended to revolve around specific training topics for providers and a greater variety of job placement options across South Dakota communities. The primary needs identified that relate to the South Dakota Community Rehabilitation Programs were:

1. Provider Training

Primarily staff contributed to this category citing the need for providers to work more effectively with persons with severe disabilities and minorities and also being more collaborative in terms of resources and working with VR. Due to turnover in the provider community and the changing needs of service, training issues are both systemic as well as more basic continuing education i.e. accessing hidden job market; serving persons with mental illness; job retention.

2. Job Placement Supports

DRS staff identified ongoing needs to have more and better trained job placement supports in their service areas (more prominent in rural communities). This need is also related to supported employment service needs for both specialized VR time-limited services and extended service capacity.

3. Community Rehabilitation Program Options

This category of need refers to those inputs from staff and community forums that expressed a desire for more options for providers and once again particularly in the rural communities. This need also included expressions of need for more specialized service providers (i.e. mental health service providers).

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4. Employer Public Outreach/Education

Often this category was referenced in the context of provider services being more connected to the employer/employment resources in the community and being postured to more efficiently match VR clients needing jobs to employer's needs.

5. Mental Health Services

Issues expressed here were expressed need statements for the expansion of case management, supported employment, placement services are made available to persons with mental illness via the provider system.

Response Statement: The Division in conjunction with the Board of Vocational Rehabilitation Services has developed strategies in the State Plan to assess and improve the community rehabilitation programs. A variety of training opportunities including conferences, webinars and seminars are provided throughout the state. In addition the Division has established a higher reimbursement rate for service providers who attend training and obtain become a Certified Employment Support Professional through Association of People Supporting Employmentfirst.

3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and to the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

In FFY 2015 DRS increased the number of students who are individuals who are students and receiving services under an Individual Education Plan (IEP) at application (371 for FFY 2014 to 444 in FFY 2015). The same trend of increase applies to students with a 504 accommodation plan, students with a disability and not covered by Section 504 and not receiving IEP services at application. As noted in a previous section of this CSNA, the burden of the 2017 Unified state plan strategy in improving services to students with disabilities at transition age will concentrate on the need to level access to the core PET services across the state. Counselor's and transition liaisons who participated in the 2015 PET Survey also expressed a the need to work with specific schools in assisting those schools strengthen their focus on services transition and partnering with VR counselors in a timely manner with regards to the coordination of services.

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